

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**IN RE BARCLAYS PLC
SECURITIES LITIGATION**

Case No. 1:22-cv-08172-KPF

DECLARATION OF JEFFREY T. SCOTT

JEFFREY T. SCOTT declares as follows:

1. I am a member of good standing of the Bar of this Court and am a partner of Sullivan & Cromwell LLP, attorneys for Defendants Barclays PLC (“Barclays”), Barclays Bank PLC (“Barclays Bank”), James E. Staley, C.S. Venkatakrishnan, Tushar Morzaria, Anna Cross, and Nigel Higgins (collectively, “Defendants”) in the above-captioned action.

2. I respectfully submit this declaration in support of Defendants’ Motion to Dismiss the Amended Class Action Complaint (“Amended Complaint”).

3. Attached as Exhibit 1 is a true and correct copy of the Securities and Exchange Commission (“SEC”) Order Instituting Cease-and-Desist Proceedings Pursuant to Section 8A of the Securities Act of 1933 and Section 21C of the Securities Exchange Act of 1934 Making Findings, and Imposing a Cease-and-Desist Order, *In the Matter of Barclays PLC and Barclays Bank PLC*, SEC Release No. 11110 (Sept. 29, 2022), which is referenced in the Amended Complaint at ¶¶ 10, 14, 18, 20, 24, 52, 65, 70-82, 84-87, 92-100, 158, 183, 251, 252, 282, and 283.

4. Attached as Exhibit 2 is a true and correct copy of Barclays’ Q1 2022 Results Announcement on Form 6-K, filed with the SEC on April 28, 2022, which is referenced in the

Amended Complaint at ¶¶ 83, 86, and 168-75.

5. Attached as Exhibit 3 is a true and correct copy of Barclays' Q2 2022 Results Announcement on Form 6-K (excerpts), filed with the SEC on July 28, 2022, which is referenced in the Amended Complaint at ¶¶ 18, 187-89, and 191.

6. Attached as Exhibit 4 is a true and correct copy of Barclays' Annual Report for the fiscal year ending December 31, 2021 on Form 20-F (excerpts), filed with the SEC on February 23, 2022, which is referenced in the Amended Complaint at ¶¶ 150-56, 162, 164, 171, 173-74, and 180.

7. Attached as Exhibit 5 is a true and correct copy of Barclays' Annual Report for the fiscal year ending December 31, 2020 on Form 20-F (excerpts), filed with the SEC on February 18, 2021, which is referenced in the Amended Complaint at ¶¶ 135-42, 145, 147, 149, 151, 154, and 155.

8. Attached as Exhibit 6 is a true and correct copy of Barclays' and Barclays Bank's Press Release on Form 6-K titled, "Impact of Over-Issuance Under BBPLC US Shelf," dated March 28, 2022, and filed with the SEC on March 28, 2022, which is referenced in the Amended Complaint at ¶¶ 15, 82, 97, 160, 162, 172, 230, 238, and 239.

9. Attached as Exhibit 7 is a true and correct copy of Barclays' amended Annual Report for the fiscal year ending December 31, 2021 on Form 20-F/A (excerpts), filed with the SEC on May 23, 2022, which is referenced in the Amended Complaint at ¶¶ 17, 87, 98, 163, and 182-84.

10. Attached as Exhibit 8 is a true and correct copy of a Barclays' Press Release on Form 6-K titled, "Update on Over-Issuance Under the Barclays Bank PLC U.S. Shelf," dated September 30, 2022, and filed with the SEC on September 30, 2022.

11. Attached as Exhibit 9 is a true and correct copy of Barclays' Q3 2022 Results Announcement on Form 6-K, filed with the SEC on October 26, 2022, which is referenced in the Amended Complaint at ¶¶ 192-93.

12. Attached as Exhibit 10 is a true and correct copy of the transcript from Barclays' 2022 Annual General Meeting, dated May 4, 2022, which is referenced in the Amended Complaint at ¶¶ 177-79 and 214-16.

13. Attached as Exhibit 11 is a true and correct copy of Barclays' and Barclays Bank's Press Release on Form 6-K titled, "Amendments to Annual Reports on Form 20-F and related matters," dated May 23, 2022, and filed with the SEC on May 23, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: May 5, 2023
New York, New York

/s/ Jeffrey T. Scott

Jeffrey T. Scott